

1 **BOIES SCHILLER FLEXNER LLP**
2 David Boies (admitted *pro hac vice*)
3 333 Main Street
4 Armonk, NY 10504
5 Tel: (914) 749-8200
6 dboies@bsfllp.com
7 Mark C. Mao, CA Bar No. 236165
8 Beko Reblitz-Richardson, CA Bar No. 238027
9 Erika Nyborg-Burch, CA Bar No. 342125
10 44 Montgomery St., 41st Floor
11 San Francisco, CA 94104
12 Tel.: (415) 293-6800
13 mmao@bsfllp.com
14 brichardson@bsfllp.com
15 enyborg-burch@bsfllp.com
16 James Lee (admitted *pro hac vice*)
17 Rossana Baeza (admitted *pro hac vice*)
18 100 SE 2nd St., 28th Floor
19 Miami, FL 33131
20 Tel.: (305) 539-8400
21 jlee@bsfllp.com
22 rbaeza@bsfllp.com
23 Alison L. Anderson, CA Bar No. 275334
24 725 S Figueroa St., 31st Floor
25 Los Angeles, CA 90017
26 Tel.: (213) 995-5720
27 alanderson@bsfllp.com

1 **SUSMAN GODFREY L.L.P.**
2 William C. Carmody (admitted *pro hac vice*)
3 Shawn J. Rabin (admitted *pro hac vice*)
4 Steven M. Shepard (admitted *pro hac vice*)
5 Alexander Frawley (admitted *pro hac vice*)
6 1301 Avenue of the Americas, 32nd Floor
7 New York, NY 10019
8 Tel.: (212) 336-8330
9 bcarmody@susmangodfrey.com
10 srabin@susmangodfrey.com
11 sshepard@susmangodfrey.com
12 afrawley@susmangodfrey.com

13 Amanda K. Bonn, CA Bar No. 270891
14 1900 Avenue of the Stars, Suite 1400
15 Los Angeles, CA 90067
16 Tel.: (310) 789-3100
17 abonn@susmangodfrey.com

18 **MORGAN & MORGAN**

19 John A. Yanchunis (admitted *pro hac vice*)
20 Ryan J. McGee (admitted *pro hac vice*)
21 201 N. Franklin Street, 7th Floor
22 Tampa, FL 33602
23 Tel.: (813) 223-5505
24 jyanchunis@forthepeople.com
25 rmcgee@forthepeople.com

26 Michael F. Ram, CA Bar No. 104805
27 711 Van Ness Ave, Suite 500
28 San Francisco, CA 94102
29 Tel: (415) 358-6913
30 mram@forthepeople.com

31 **UNITED STATES DISTRICT COURT**
32 **NORTHERN DISTRICT OF CALIFORNIA**

33 CHASOM BROWN, WILLIAM BYATT,
34 JEREMY DAVIS, CHRISTOPHER
35 CASTILLO, and MONIQUE TRUJILLO
36 individually and on behalf of all similarly
37 situated,

38 Plaintiffs,
39
40 vs.
41
42 GOOGLE LLC,
43
44 Defendant.

45 Case No.: 4:20-cv-03664-YGR-SVK

46 **DECLARATION OF MARK C. MAO IN**
47 **SUPPORT OF PLAINTIFFS' REPLY RE:**
48 **SUPPLEMENTAL SANCTIONS**

49 Referral: The Honorable Susan van Keulen

DECLARATION OF MARK C. MAO

I, Mark C. Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify

2. I submit this Declaration in support of Plaintiffs' Reply in Support of Their Supplemental Sanctions Brief Pursuant to Dkt. 624.

3. Attached hereto as **Exhibit B**¹ is a true and correct copy of a document Google produced in discovery labeled GOOG-BRWN-00857642.

4. Attached hereto as **Exhibit C** is a true and correct copy of a document Google produced in discovery labeled GOOG-CABR-00546609.

5. Attached hereto as **Exhibit D** is a true and correct copy of a document Google produced in discovery labeled GOOG-CABR-04087254.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 25th day of August, 2022, at San Francisco, California.

/s/ *Mark C. Mao*

¹ For the Court's ease of reference, Plaintiffs continue the serial labeling of exhibits from their opening brief.